

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
AUBREY DRAKE GRAHAM,	:	
	:	
Plaintiff,	:	
	:	
v.	:	No. 1:25-cv-399-JAV
	:	
UMG RECORDINGS, INC.,	:	
	:	
Defendant.	:	
	:	
	-X	

**DECLARATION OF M. ANNIE HOUGHTON-LARSEN IN SUPPORT OF
PLAINTIFF’S LETTER MOTION TO COMPEL LUCIAN GRAINGE’S CUSTODIAL
DOCUMENTS**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this Court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiff Aubrey Drake Graham (“Plaintiff”) in the above-captioned action.
2. I submit this declaration in support of Plaintiff’s Letter Motion to Compel Defendant UMG Recordings, Inc. (“UMG”) to collect, review, and produce the responsive custodial documents of UMG’s Chairman and Chief Executive Officer, Lucian Grainge (“Grainge”).
3. Attached as Exhibit 1 is a true and correct copy of Plaintiff’s first set of Requests for Production to Defendant dated March 10, 2025.
4. Attached as Exhibit 2 is a true and correct copy of Plaintiff’s letter to Defendant counsel dated May 7, 2025.

5. Attached as Exhibit 3 is a true and correct copy of Plaintiff's letter to Defendant dated May 13, 2025.

6. Attached as Exhibit 4 is a true and correct copy of Plaintiff's letter to Defendant dated May 23, 2025.

7. Attached as Exhibit 5 is a true and correct copy of an email from Plaintiff to Defendant dated May 30, 2025.

8. Attached as Exhibit 6 is a true and correct copy of Plaintiff's second set of Requests for Production to Defendant dated June 3, 2025.

9. Attached as Exhibit 7 is a true and correct copy of an email from Plaintiff to Defendant dated June 6, 2025.

10. Attached as Exhibit 8 is a true and correct copy of Plaintiff's letter to Defendant dated July 3, 2025.

11. Attached as Exhibit 9 is a true and correct copy of Plaintiff's third set of Requests for Production to Defendant dated July 14, 2025.

12. Attached as Exhibit 10 is a true and correct copy of Defendant's letter to Plaintiff dated July 16, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2025.

/s/ M. Annie Houghton-Larsen
M. Annie Houghton-Larsen
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